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Harvey A. Steinberg

March 5, 2021

BY ECF

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: *United States v. Brian Kolfage, et al.*, 20 Cr. 412(AT)

Dear Judge Torres:

I and my firm represent Defendant Brian Kolfage in the above-captioned matter and appear in this case *pro hac vice*.

Mr. Kolfage is currently at liberty on pretrial release conditions that include the condition that his travel be restricted to the Northern District of Florida, except for travel to the Southern District of New York to attend Court and the District of Colorado to meet with his counsel.

Mr. Kolfage wishes to travel by automobile to Orlando, Florida, which is in the Middle District of Florida, with his wife and children for the children's spring break. They plan to leave for this trip on March 16 and return to his residence on March 20, 2021. They plan to stay at a hotel in the Orlando area while in the Middle District of Florida. Mr. Kolfage has advised his supervising Pretrial Services Officer in Florida, and we have advised Francesca Tessier-Miller, a Pretrial Services Officer for this Court, of Mr. Kolfage's travel plans and itinerary, including the name and location of the hotel. Pretrial Services has advised that it has no objection to this travel. We have also advised government counsel of this planned trip, and AUSA Sobelman, responding on its behalf, has advised that the Government has no objection to this travel as well.

We respectfully request that the Court modify Mr. Kolfage's pretrial release

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travel condition for the limited purpose of allowing this trip in accordance with the itinerary that has been provided to Pretrial Services and described to the Government.

Respectfully Submitted,

s/Harvey A. Steinberg
Harvey A. Steinberg
For the Firm

Cc: All Counsel of Record
Francesca Tessier-Miller,
U.S. Pretrial Services Officer (via email)